

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio



United States of America
v.
Jereldao LOPEZ MENDOZA

Case No. 2:23-mj-187

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17, 2023 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section
21 U.S.C. 841

Offense Description
possession with intent to distribute a mixture or substance containing a
detectable amount of methamphetamine

This criminal complaint is based on these facts:
See attached affidavit, which is incorporated by reference.

☐ Continued on the attached sheet.

TFO Jacob Heaberlin
Complainant's signature

Jacob Heaberlin, DEA Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/20/2023

City and state: Columbus, Ohio

Chelsey M. Vascura
Judge's signature
Chelsey M. Vascura
United States Magistrate Judge

Printed name and title



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jacob Heaberlin, being duly sworn, depose and state:

INTRODUCTION

I am a Detective with the Franklin County Sheriff's Office assigned to the Drug Enforcement Administration Columbus District Office (DEA-CDO). I have been employed by the Franklin County Sheriff's Office (FCSO) since April 2011, during which time I have worked in the Corrections Division, Training Academy, Patrol Bureau, and most recently the Special Investigations Unit. I have participated in numerous investigations while on Patrol and within Special Investigations Unit, with a focus on narcotics possession and distribution.

I hold a Bachelor of Science degree from Urbana University (Criminal Justice) and an Ohio Peace Officer Training Academy – Basic Peace Officer certification. Through my career I have received the following specialized training: Patrol Drug Operations, Criminal Interdiction, Street Drug Recognition, and Identification and Human Trafficking.

The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement sources and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

1. On or about Friday March 17, 2023, members of law enforcement were conducting parcel inspections at an international parcel delivery company in Columbus, Ohio. An investigator with the Ohio Bureau of Criminal Investigation (BCI) applied for and was granted a State of Ohio search warrant for a parcel addressed to Martha Hernandez at 3515 Derrer Field Drive, Columbus, Ohio (the "TARGET ADDRESS"). Upon execution of that search warrant, approximately 5,397 gross grams of suspected methamphetamine were discovered within the parcel (the "FIRST PARCEL"). The suspected methamphetamine was packaged inside a clear, airtight, plastic tote and surrounded by paper and packing peanuts. The suspected methamphetamine was contained within layers of plastic wrap. A field test was conducted on the suspected methamphetamine, which resulted in a presumptive positive test for methamphetamine.
2. An investigator with the DEA-CDO applied for and was granted a Federal anticipatory search warrant for the TARGET ADDRESS. An additional investigator from the DEA-CDO applied for and was granted a Federal tracking-device warrant for the FIRST PARCEL. Investigators with the DEA-CDO removed the methamphetamine from the FIRST PARCEL and replaced it with "sham," a harmless substance that has a similar appearance to real methamphetamine.
3. Investigators then established surveillance at the TARGET ADDRESS at approximately 3:30 pm. Shortly after, investigators observed a grey Nissan Sentra, bearing Ohio registration

JWG4405 (the “TARGET VEHICLE”), registered to Jereldao LOPEZ MENDOZA, arrive at the TARGET ADDRESS. A Hispanic male, later identified as LOPEZ MENDOZA, exited the driver’s seat and entered the TARGET ADDRESS.

4. An undercover investigator then delivered the FIRST PARCEL to the TARGET ADDRESS. The investigator knocked on the front door, then positioned the FIRST PARCEL near the front door. Subsequently, investigators observed LOPEZ MENDOZA open the door, retrieve the FIRST PARCEL, and take it inside the TARGET ADDRESS. Investigators then executed the search warrant.

5. During the execution of the search warrant, investigators located LOPEZ MENDOZA in his bedroom. The search revealed the FIRST PARCEL had been placed in the bedroom closet of LOPEZ MENDOZA.

6. Investigators, with the assistance of a fluent Spanish speaking investigator, conducted an interview with LOPEZ MENDOZA. LOPEZ MENDOZA was read his *Miranda* rights, verbally acknowledged his rights, and agreed to speak with investigators. LOPEZ MENDOZA admitted he retrieved the FIRST PARCEL from the front porch of the TARGET ADDRESS and placed it into his bedroom closet. Investigators noticed the shipping label on the FIRST PARCEL had been removed from the box. LOPEZ MENDOZA also granted investigators permission to look at the content within one of his cellular devices and provided investigators with the passcode.

7. During the course of the search warrant, an FCSO Patrol K-9 conducted a free air sniff around the TARGET VEHICLE, which resulted in a positive alert to the odor of narcotics coming from the TARGET VEHICLE. A probable cause search of the TARGET VEHICLE revealed a parcel (the “SECOND PARCEL”), similar in shape and size to the FIRST PARCEL, located within the trunk of the TARGET VEHICLE. The SECOND PARCEL was also shipped from California to a Columbus, Ohio address and was delivered at approximately 1:20 pm on March 17, 2023. A search of the SECOND PARCEL resulted in a seizure of approximately 6,370 gross grams of suspected methamphetamine. The suspected methamphetamine was packaged inside a clear, airtight, plastic tote and surrounded by paper and packing peanuts, in a manner nearly identical to the packaging in the FIRST PARCEL. The suspected methamphetamine was again contained in layers of plastic wrap. A field test was conducted on the suspected methamphetamine, which resulted in a presumptive positive test for methamphetamine.

8. Following the discovery of the SECOND PARCEL, investigators attempted to interview LOPEZ MENDOZA again. However, LOPEZ MENDOZA stated he no longer desired to speak with investigators. Investigators terminated the interview.

9. Based upon my training, experience, and review of the evidence gathered by investigators during this investigation, there is probable cause to believe Jereldao LOPEZ MENDOZA is in violation of 21 U.S.C. § 841, possession with intent to distribute a detectable amount of methamphetamine (approximately 11,767 gross grams of methamphetamine). This affidavit is in support of a request for the issuance of an arrest warrant for Jereldao LOPEZ MENDOZA.

TFO Jake Heaberlin

Jake Heaberlin
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn before me this 20th day of March 2023.

Chelsey M. Vascara

Chelsey M. Vascara
United States Magistrate Judge
Southern District of Ohio